



June 13, 2017

VIA ECF

Magistrate Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Eugenie Bouchard v. United States Tennis Association, et al.
Civ. Case No. : 1:15-cv-5920

Dear Judge Bloom:

This office represents the Defendants in the above matter.

The purpose of this letter is to request an extension of the present deadline (June 30) to complete expert deadline as it pertains to the availability of one of the Defendants' experts. She is a former tennis professional and who lives and works in Australia. She has provided a Rule 26 report in this case. She can give a deposition in Australia before June 30, but Plaintiff's counsel has objected to traveling there to conduct the deposition. For a deposition after June 30, the expert has indicated that a deposition in the United States during the week of July 10 would fit into her professional and personal schedule.

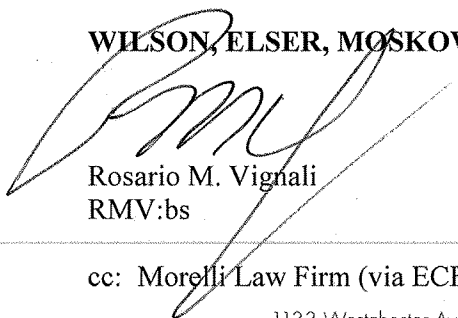
As for Defendants three other experts, Defendants on Friday (June 9) gave Plaintiff's counsel multiple dates for their depositions – all before the June 30 deadline. However, as of this writing, Plaintiff has not agreed to any of the dates.

Plaintiff's counsel has also provided dates for the availability of Plaintiff's three experts for depositions – also, all before the June 30 deadline. Defendants have indicated their choice dates in an e-mail that was sent yesterday to Plaintiff's counsel, but Plaintiff's counsel has yet to confirm the dates. Instead, Plaintiff's counsel has indicated a preference to extend the expert discovery deadline for all experts, instead of just the one described herein.

We look forward to the opportunity to speak to Your Honor regarding Defendants' request, and the current situation involving the scheduling of depositions, at the Court's earliest convenience.

Very truly yours,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP



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